



# INSTITUTE OF FOOD TECHNOLOGISTS

THE SOCIETY FOR FOOD SCIENCE AND TECHNOLOGY

BRUCE R. STILLINGS, Ph.D. / *President, 1998-1999*

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April 6, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
12420 Parklawn Drive, Room 1-23  
Rockville, MD 20857

Docket No. 98N-0826

Topic: Food Labeling: Use on Dietary Supplements of Health Claims Based on  
Authoritative Statements

Dear Sir or Madam:

The Institute of Food Technologists welcomes the opportunity to submit these comments on the proposed rule for health claims on dietary supplements. Founded in 1939, IFT is a nonprofit scientific society with 28,000 members working in food science, food technology, nutrition and related fields in industry, academia and government. A working group of members of IFT's Nutrition Division, which has approximately 1,800 members, prepared these comments on IFT's behalf.

IFT agrees with FDA that its proposal to permit health claims on dietary supplements should be based on authoritative statements published by U.S. Government agencies or by the National Academy of Sciences, and that health claims for both supplements and foods should be subject to the same scientific standards and procedures. This proposal appears to correct an oversight in the Food and Drug Administration Modernization Act of 1997.

However, foods are limited to making certain health claims for naturally-present nutrients, i.e., without fortification, present at a level of at least 10% of the Daily Value for vitamin A, vitamin C, iron, calcium, protein, or dietary fiber. Will dietary supplements, which are fabricated from many constituents including individual nutrients, be permitted to bear health claims for added nutrients? If so, dietary supplements would have an unfair and misleading advantage over conventional foods.

98N-0826

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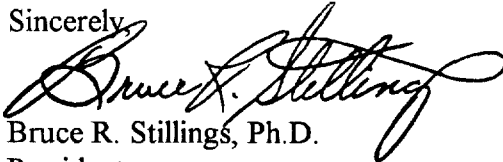
The proposed rule does not address the submission of health claims based on non-nutrient compounds or materials in dietary supplements. If, for example, substantial evidence was presented to justify a health claim that consumption of St. John's wort may help prevent or reduce the severity of depression, would foods as well as dietary supplements containing this botanical be permitted to bear the claim?

#### FDA Workload

IFT recommends that Congress increase funding for FDA to provide adequate staff to review the health claim submission materials, since the submissions represent additional workload for FDA.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce R. Stillings". The signature is fluid and cursive, with a large, stylized "S" at the end.

Bruce R. Stillings, Ph.D.  
President

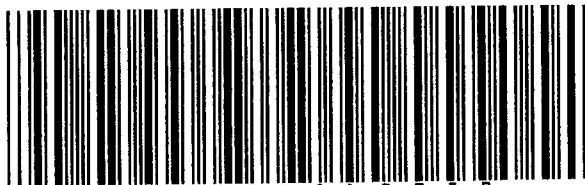
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